

### **REMARKS**

After entry of this amendment, claims 1-3, 5-15, and 22-35 will be pending, for a total of 28 claims, of which three claims are independent. As Applicant previously had a total of 28 pending claims, of which two were independent, no additional claims fees are believed to be due.

By this amendment, Applicant has amended claim 1 to include features previously recited in claim 4 and, accordingly, has canceled claim 4 without prejudice or disclaimer. Applicant has also amended claim 22 and has entered a new claim 35. Claims 22 and 35 recite features that are disclosed in Applicant's specification at least on page 58, lines 18-24. No new matter has been added. Reconsideration and allowance of this application are respectfully requested in view of the foregoing amendments and the following remarks.

#### **The Information Disclosure Statements**

Applicant and the undersigned sincerely apologize for any inconvenience to the Examiner due to the duplicative Information Disclosure Statements.

#### **Claim Rejections Under 35 U.S.C. § 103(a)**

Claims 1-3, 6-9, 13, 22, 24-26, and 28 were rejected under 35 U.S.C. § 103(a) over Crespo et al., U.S. Patent No. 6,397,179, in view of Braden-Harder et al., U.S. Patent No. 5,933,822. Claim 4 was rejected over Crespo et al. in view of Braden-Harder et al., and further in view of McDonough et al., U.S. Patent No. 5,625,748. Claims 5, 14, and 23 were rejected over Crespo et al. in view of Braden-Harder et al., and further in view of Appelt, U.S. Patent No. 6,601,026. Claims 10-12 and 27 were rejected over Crespo et al. in view of Braden-Harder et al., and further in view of Barclay et al., U.S. Patent No. 5,960,399. Claims 29 and 32 were rejected over Crespo et al. in view of Braden-Harder et al., and further in view of Messerly et al., U.S. Patent No. 6,246,977. Finally, claims 30-31 and 33-34 were rejected over Crespo et al. in view of Braden-Harder et al. and further in view of Kupiec, U.S. Patent No. 5,696,962. Applicant respectfully traverses these rejections with respect to the claims as amended.

Claim 1, as amended, recites the features of dependent claim 4, that “[the] semantic decoding [is] based on a term frequency calculation, which term frequency calculation is based on calculating a lexical distance between each word in [the] recognized words with each word of one or more topic query entries.” Applicant has also added that the lexical distance calculations are performed “using a lexical dictionary.” Claim 22 recites that the semantic decoding “is based on a combined metric that includes term frequency, semantic coverage, and semantic distance, the semantic decoding using a lexical dictionary.” Applicant respectfully submits that the cited combinations of references do not disclose or suggest at least those features, in addition to the other features recited in the independent claims.

The Examiner admits that Crespo et al. does not disclose the claim features of generating “at least two types of search predicates,” “a query formulation engine” or that “semantic decoding is performed on entire word sentences” and relies on Braden-Harder et al. to disclose those features. However, the Examiner admits that Braden-Harder et al. does not disclose the features previously recited in claim 4, and relies on McDonough et al. for those features.

McDonough et al. may disclose the calculation of a distance measure, but it does not disclose or suggest doing so with the use of a lexical dictionary. Instead, McDonough et al. appears to use a “probability model” for spotting certain words as being related to certain topics. Moreover, there is certainly no disclosure in McDonough et al. of a “combined metric” for evaluating semantic similarity, as recited in claim 22, in combination with the use of a lexical dictionary.

Accordingly, Applicant respectfully submits that independent claims 1 and 22 are patentable over the cited combination of references. (Additionally, new independent claim 35 has similar recitations and is believed to be patentable for at least the same reasons as claims 1 and 22.) The other references do not remedy this deficiency of McDonough et al.; therefore, Applicant respectfully submits that the dependent claims are patentable for at least the same reasons. Applicant respectfully requests that the rejections be withdrawn.

**CONCLUSION**

In view of the above, Applicant respectfully submits that this patent application is in condition for allowance, and a timely Notice to that effect is earnestly solicited. If any questions relating to patentability remain, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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